

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA**

**CIVIL NO.: 12-2039 (GAG)**

**Plaintiffs**

**v.**

**COMMONWEALTH OF PUERTO RICO,  
et al.**

**Defendants**

**MOTION FOR EXTENSION OF TIME TO FILE STIPULATION TO SUPPLEMENT  
THE SEALED ORDER**

**TO THE HONORABLE COURT:**

COMES NOW, the Puerto Rico Police Department (PRPD) through the undersigned counsel and respectfully states and prays as follows:

1. On December 10, 2015, this Honorable Court entered a sealed order with directives that limit the TCA's activities consistent with the Agreement for the Sustainable Reform of the Puerto Rico Police Department" (hereinafter referred to as the "Agreement"). The order states that any additional directives that the Parties deem necessary shall be filed by February 1, 2016. See, ECF Document No. 288.

2. On February 1, 2016, the Parties jointly moved for an extension of time until today, to file the additional directives in light of the airing of a particular program in which the TCA had been interviewed. See ECF Document No. 308.

3. This morning, the Department of Justice has kindly forwarded a joint proposal of directives for the local Department of Justice's review. Due to prior work engagements, the

undersigned counsel has not yet been able to comment the document which must also be discussed with the Secretary of Justice.

4. In addition, the Parties require additional time to reach an agreement on the supplementary directives, in order to present a consensus proposal to the Court among all involved.

5. In light of the above, the undersigned hereby requests an additional extension of time of ten (10) days, that is, until February 16, 2016, to submit the Stipulation to Supplement the Directives.

6. Plaintiff's counsel of record does not object to this extension of time.

WHEREFORE defendant respectfully requests from this Honorable Court that it grants the extension requested until February 16, 2016.

WE HEREBY CERTIFY that on today's date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the parties and counsel of record.

In San Juan, Puerto Rico, this 5<sup>th</sup> day of February 2016.

RESPECTFULLY SUBMITTED.

**CESAR MIRANDA RODRÍGUEZ**  
Secretary of Justice

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